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17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 vs.  
23 **PLAINTIFF WAYMO LLC'S  
24 ADMINISTRATIVE MOTION TO FILE  
25 UNDER SEAL ITS OPPOSITION TO  
26 OTTO TRUCKING'S MOTION FOR  
27 RELIEF FROM NON-DISPOSITIVE  
28 ORDER RE: WAYMO'S MOTION TO  
COMPEL**

29 Defendants.

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Pursuant to Civil L.R. 7-11 and 79-5, Plaintiff Waymo LLC (“Waymo”) respectfully requests to file under seal information in its Opposition to Otto Trucking’s Motion for Relief from Nondispositive Order Re: Waymo’s Motion to Compel (“Waymo’s Opposition”), filed concurrently herewith. Specifically, Waymo requests an order granting leave to file under seal the portions of the documents as listed below:

| Document           | Portions to Be Filed Under Seal | Designating Party |
|--------------------|---------------------------------|-------------------|
| Waymo’s Opposition | Highlighted in Blue             | Defendants        |

### I. **LEGAL STANDARD**

Civil Local Rule 79-5 requires that a party seeking sealing “establish[] that the document, or portions thereof, are privileged, protectable as a trade secret or otherwise entitled to protection under the law” (*i.e.*, is “sealable”). Civil L.R. 79-5(b). The sealing request must also “be narrowly tailored to seek sealing only of sealable material.” *Id.*

### II. **DEFENDANTS’ CONFIDENTIAL INFORMATION**

Waymo seeks to seal the portions of Waymo’s Opposition only because Defendants have designated the information confidential. Declaration of Lindsay Cooper (“Cooper Decl.”) ¶ 3. Waymo takes no position on the merits of sealing Defendants’ designated material, and expects Defendants to file one or more declarations in accordance with the Local Rules.

### III. **CONCLUSION**

In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the above listed documents accompany this Administrative Motion. For the foregoing reasons, Waymo respectfully requests that the Court grant Waymo’s Administrative Motion.

DATED: July 21, 2017

QUINN EMANUEL URQUHART & SULLIVAN,  
LLP

By /s/ Charles K. Verhoeven

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Attorneys for WAYMO LLC